

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

BILLY RAY NORTON,

Plaintiff

v.

**TRANS UNION, LLC AND CREDIT
CONTROL, LLC**

Defendants

Civil Action No. 15-CV-649-MJR

MOTION TO SUBSTITUTE ATTORNEY

AND NOW comes Defendant Credit Control, LLC, by and through its undersigned counsel, who respectfully moves this Honorable Court to substitute Joel S. Halvorsen, Esquire, of Sturycz Watts LLC, as counsel for Credit Control, LLC, 5757 Phantom Drive, Suite 250, Hazelwood, MO 63042 in place and instead of Lauren M. Burnette of Marshall Dennehey Warner Coleman & Goggin, 100 Corporate Center Drive, Suite 201, Camp Hill, PA 17011, and in support thereof avers as follows:

1. Plaintiff commenced this matter in the United States District Court for the Eastern District of Pennsylvania on February 11, 2015.

2. After waiving service of the summons and complaint, Credit Control moved to dismiss Plaintiff's claims against it for lack of personal jurisdiction on April 27, 2015.

3. Thereafter, the parties stipulated to the transfer of Plaintiff's claims against Credit Control to this Honorable Court.

4. On June 10, 2015, this matter was formally transferred to this Honorable Court.

5. Credit Control now respectfully requests that this Honorable Court substitute Joel S. Halvorsen, Esquire of Sturycz Watts LLC, 5757 Phantom Drive, Suite 250, Hazelwood, MO 63042, as counsel for Credit Control, LLC, in place and instead of Lauren M. Burnette of Marshall Dennehey Warner Coleman & Goggin, 100 Corporate Center Drive, Suite 201, Camp Hill, PA 17011.

6. No party will be prejudiced by the substitution of counsel and indeed, such substitution is necessary, as Mr. Halvorsen is admitted to practice in this Honorable Court, while Ms. Burnette is not.

WHEREFORE, Defendant Credit Control, LLC respectfully requests that this Honorable Court substitute Joel S. Halvorsen, Esquire of Sturycz Watts LLC, 5757 Phantom Drive, Suite 250, Hazelwood, MO 63042, as counsel for Credit Control, LLC, in place and instead of Lauren M. Burnette of Marshall Dennehey Warner Coleman & Goggin, 100 Corporate Center Drive, Suite 201, Camp Hill, PA 17011.

Respectfully submitted,

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

By: 

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Current Attorney for Defendant Credit
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STURYCZ WATTS LLC

By: /s/ Joel S. Halvorsen

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Proposed Attorney for Defendant Credit
Control, LLC

CERTIFICATE OF SERVICE

I certify that on this day I served a copy of the foregoing document *via*
United States Mail, postage prepaid, which satisfies the Federal Rules of Civil
Procedure, to the following:

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Date: 7/6/15